



Gideon Orion Oliver

—ATTORNEY AT LAW—

He/him/his

277 Broadway, Suite 1501
New York, NY 10007

1825 Foster Avenue, Suite 1K
Brooklyn, NY 11230

Gideon@GideonLaw.com*

GideonLaw.com

Office: (718) 783-3682

Signal: (646) 263-3495

Fax: (646) 349-2914*

**Not for service*

June 14, 2024

VIA ECF

Honorable Taryn A. Merkl , United States Magistrate Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Korey Watson v. The City of New York et al.*, 23-CV-08975 (LDH)(TAM)

Your Honor:

I am co-counsel for Plaintiff Korey Watson in the above-referenced matter. I write to respectfully request that Your Honor extend the deadline to complete Phase 1 discovery from June 17, 2024 until July 1, 2024. Counsel for the City of New York joins in this application and counsel for Defendant FJC Security Services, Inc. consents to this application. By way of brief procedural background, on April 17, 2024, the parties participated in the Initial Conference and the Court adopted a Scheduling Order. *See* Civil Docket Entry dated April 17, 2024. In pertinent part, that order set June 17, 2024 as the deadline to complete Phase 1 discovery and further scheduled a Pre-Settlement Status Conference for July 9, 2024. *Id.* The deadline for fact discovery is August 27, 2024. *Id.* Since the Initial Conference, the parties have exchanged initial disclosures and other document discovery and further engaged in meaningful meet and confers. Currently, the parties are working on their responses to the first requests for documents and interrogatories, which were timely served by the parties. The parties would benefit from additional time to respond to the request for documents requests and interrogatories, which would require a brief extension of the June 17, 2024 deadline to complete Phase I discovery. This brief extension of the deadline for Phase I discovery would permit the parties additional time to carefully respond to the requests for document and interrogatories without causing any delay in this matter. Further, the time will allow the parties the freedom to have meet and confers as they relate to that discovery as well as regarding potential resolution of the case in advance of the July 9, 2024 conference. Thus, Plaintiff respectfully requests that Your Honor extend the deadline to complete Phase 1 discovery from June 17, 2024 until July 1, 2024.

Thank you for your attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver